

## **EXHIBIT 22**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

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MARYLAND SHALL ISSUE, INC., :  
et al., :  
: Case No:  
Plaintiffs : 16-cv-3311-MJG  
:  
-vs- : Pages 1 - 229  
:  
LAWRENCE HOGAN, in his :  
capacity of Governor of :  
Maryland, et al., :  
:  
Defendants :  
-----X

Deposition of Diane S. Armstrong  
Baltimore, Maryland  
Friday, March 23, 2018

Reported by: Kathleen M. Vaglica, RPR, RMR  
Job No: 391104

MAGNA LEGAL SERVICES  
(866) 624-6221

1 Q. All right. Now, what is your position  
2 with the Maryland State Police?

3 A. My position is office supervisor for the  
4 civilian staff for the Handgun Qualification License  
5 Unit.

6 Q. All right. I'm going to mark as  
7 Exhibit 43 a copy of the deposition notice and  
8 subpoena for today's deposition.

9 (Armstrong Exhibit No. 43, Notice of  
10 Deposition and Subpoena, was marked for  
11 identification and retained by Mr. Scott.)

12 (Mr. Hansel entered the deposition room.)

13 MR. SWEENEY: Morning, Cary.

14 MR. HANSEL: Morning.

15 MR. SWEENEY: You didn't miss anything.

16 MR. HANSEL: Good.

17 BY MR. SWEENEY:

18 Q. Ms. Armstrong, I'd ask you to take a look  
19 at the document I've marked as Exhibit 43. The  
20 first three pages are the deposition notice for the  
21 Maryland State Police. The next three pages are the  
22 subpoena for that deposition, and then there are

1 number of times that you've received these e-mails  
2 and phone calls?

3 A. I do not keep track of them individually.  
4 You have all the e-mails that we've received, and  
5 the phone calls, we don't keep track of the phone  
6 calls so I cannot give you a number.

7 Q. Referring you to paragraph eight of the  
8 declaration, Exhibit 47, what do you do when asked  
9 to assist citizens who have inadvertently created  
10 multiple accounts and initiated multiple  
11 applications?

12 A. Well, we have one applicant that created  
13 nine accounts, and when they create nine accounts or  
14 multiple accounts, then we have to refer them over  
15 or we refer it over to our IT section for them  
16 'cause they have to delete the accounts.

17 Q. All right. So is it the practice when  
18 individuals have initiated multiple accounts that  
19 you refer them to IT for the deletion of those  
20 multiple accounts?

21 A. If we cannot figure out their information  
22 on the phone with them, then we do not have the

1 ability to move any further.

2 Q. All right. So at that point, the citizen  
3 is referred to another part of the Maryland State  
4 Police, its IT unit?

5 A. No. We contact the IT section on their  
6 behalf, and then we get back to this applicant when  
7 it's corrected.

8 Q. And the correction in the instance of  
9 multiple applications is the multiple applications  
10 in the system are canceled out?

11 A. I don't know the process on that so I  
12 can't answer that.

13 Q. What is it that you give back to the  
14 applicant and tell them that has resolved the  
15 problem of their multiple applications? What do you  
16 say to them?

17 A. We give them the user ID and assist them  
18 with resetting their passwords.

19 Q. And you would be resetting it on one of  
20 their existing applications in the system?

21 A. Correct.

22 Q. And to your knowledge, what happens to

1 those other multiple applications that were in the  
2 system when you reset the existing application?

3 A. I can't -- I don't know what happens to  
4 them.

5 Q. In the course of doing that, do you obtain  
6 the unique user name and password of any applicants?

7 A. To reset their account?

8 Q. Yes.

9 A. No. We have access to their user name,  
10 but we don't have access to passwords.

11 Q. Do you ever request the password of an  
12 applicant?

13 A. If they want us to reset the password for  
14 them, they have to give us a password.

15 Q. And do you do that?

16 A. On occasion, yes.

17 Q. Do you know how often you do that?

18 A. Not very often.

19 Q. And do you do anything special to  
20 safeguard the password that you obtained from the  
21 HQL applicant for that purpose?

22 A. We don't write it down or, if we do, we

1 applicants that contain their passwords?

2 MR. SCOTT: Objection. Go ahead.

3 THE WITNESS: I believe everything is  
4 encrypted, but I can't answer on what the server  
5 does, what the IT section does with those e-mails.

6 BY MR. SWEENEY:

7 Q. Paragraph nine you refer to one qualified  
8 handgun instructor creating fictional accounts in  
9 order to walk his students through the HQL  
10 application process; am I correct?

11 A. Correct.

12 Q. Earlier today we talked about a qualified  
13 handgun instructor who had contacted you and talked  
14 about creating a fictional account. Is this the  
15 same instructor?

16 A. Yes.

17 Q. Do you know if that instructor has ever  
18 created more than one fictional account for the  
19 purpose of walking his students through the HQL  
20 application process?

21 A. I do not know.

22 Q. Do you know of any other qualified handgun

1 THE WITNESS: I can't answer that. I  
2 don't know their requirements.

3 BY MR. SWEENEY:

4 Q. All right. How many applications have  
5 been initiated by individuals who are younger than  
6 21 in the HQL system?

7 A. I can't give you an answer to that. I  
8 don't know the number.

9 Q. Is there anyone who can tell me that  
10 number?

11 A. Not to my knowledge.

12 Q. In paragraph 11 you say, "MSP personnel  
13 have initiated numerous applications for testing  
14 purposes." How do you know that?

15 A. Because I, personally, have done it.

16 Q. And how many applications have you  
17 initiated for testing purposes?

18 A. Five.

19 Q. And do you know how many other  
20 applications MSP personnel have initiated for  
21 testing purposes?

22 A. No, I do not know that.